

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A	§	
BRAZOS LICENSING AND	§	CIVIL ACTION 6:20-cv-00980-ADA
DEVELOPMENT,	§	CIVIL ACTION 6:20-cv-00981-ADA
<i>Plaintiff,</i>	§	CIVIL ACTION 6:20-cv-00982-ADA
	§	
v.	§	
	§	
CANON, INC.,	§	
<i>Defendant.</i>	§	
	§	
	§	

**PLAINTIFF WSOU INVESTMENTS, LLC D/B/A BRAZOS LICENSING AND
DEVELOPMENT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSES TO DEFENDANT CANON, INC.'S MOTIONS TO DISMISS AND
MOTION FOR JUDGMENT ON THE PLEADINGS**

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”) files this Unopposed Motion for Extension of Time to File Responses to Defendant Canon, Inc.’s (“Canon”) Motions to Dismiss and Motion for Judgment on the Pleadings and shows:

On April 26, 2021, Canon filed Motions to Dismiss under Federal Rule of Civil Procedure 12(b)(6) and a Motion for Judgment on the Pleadings under Federal Rule of Procedure 12(c) (“Motions”). *See* Case No. 6:20-cv-00980, Dkt. 32; Case No. 6:20-cv-00981, Dkt. 23; Case No. 6:20-cv-00982, Dkt. 23. Under W.D. Tex. Local Rule CV-7(e)(2), the deadline for WSOU to file its responses to Canon’s Motions is May 10, 2021. WSOU requests that the Court grant a 14-day extension of the current deadline, up to and including May 24, 2021, for filing responses to Canon’s Motions. Canon does not oppose this extension.

Based on the foregoing, WSOU respectfully requests that the Court extend the deadline for filing responses to Canon's Motions by an additional 14 days, up to and including May 24, 2021.

Dated: May 5, 2021

RESPECTFULLY SUBMITTED,

By: /s/ Jonathan K. Waldrop
Jonathan K. Waldrop (CA Bar No. 297903)
(Admitted in this District)
jwaldrop@kasowitz.com
Darcy L. Jones (CA Bar No. 309474)
(Admitted in this District)
djones@kasowitz.com
Marcus A. Barber (CA Bar No. 307361)
(Admitted in this District)
mbarber@kasowitz.com
John W. Downing (CA Bar No. 252850)
(Admitted in this District)
jdowning@kasowitz.com
Heather S. Kim (CA Bar No. 277686)
(Admitted in this District)
hkim@kasowitz.com
Jack Shaw (CA Bar No. 309382)
(Admitted in this District)
jshaw@kasowitz.com
KASOWITZ BENSON TORRES LLP
333 Twin Dolphin Drive, Suite 200
Redwood Shores, California 94065
Telephone: (650) 453-5170
Facsimile: (650) 453-5096

Mark D. Siegmund (TX Bar No. 24117055)
mark@waltfairpllc.com
LAW FIRM OF WALT FAIR, PLLC
1508 N. Valley Mills Drive
Waco, TX 76710
Telephone: (254) 772-6400
Facsimile: (254) 772-6432

Attorneys for Plaintiff
WSOU INVESTMENTS, LLC d/b/a
BRAZOS LICENSING AND
DEVELOPMENT

CERTIFICATE OF CONFERENCE

On May 5, 2021, counsel for WSOU communicated with Richard F. Martinelli, counsel for Canon, concerning the foregoing motion and Mr. Martinelli advised that Canon was not opposed to the grant of a 14-day extension of time for WSOU to file responses to Canon's Motions.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of May, 2021, the foregoing document was filed electronically with the Clerk of the Court via the Court's CM/ECF system which will send notification of such filing and constitute service upon all counsel of record who have registered as Filing Users. Any other known counsel of record will be served with a copy of the foregoing document via email.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop